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February 1, 2023

Via ECF

Honorable Jennifer H. Rearden, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 15A  
New York, New York 10007

Re: **Zantaz Enterprise Archive Solution, LLC f/k/a Capax, Discovery, LLC v. MidMichigan Health & MidMichigan Health Care Systems, Inc.;**  
**Case 1:22-cv-09395-(JHR)**

Your Honor:

As the Court is aware, I am the attorney of record on the foregoing matter for the plaintiffs and I submitted a previous Letter Motion to the Court seeking permission to withdraw from the action on behalf of my client (Dkt 30). In response to the Court's directive, pursuant to Local Civil Rule 1.4, I will NOT be asserting a Retaining or Charging Lien and that the plaintiff still consents to the request to Withdraw. All other considerations raised in the initial Letter Motion (Dkt. 30) are incorporated by reference herein as if fully set forth.

I still respectfully request a period of thirty (30) days to allow my client the opportunity to obtain substitute counsel.

Respectfully Submitted,

/s/ Robert E. Gallagher, Jr.  
Robert E. Gallagher, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that on February 1, 2023, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which electronically notified All Counsel of Record (via ECF).

By: /s/Robert E. Gallagher, Jr.

Application granted. The Clerk of Court is directed to terminate attorney Robert E. Gallagher, Jr. from this case and to terminate the letter-motions at ECF Nos. 30 and 33.

SO ORDERED.



Jennifer H. Rearden, U.S.D.J.

Date: Feb. 1, 2023